

DESCHUTES RIVER, PERCIVAL CREEK, AND BUDD INLET TRIBUTARIES MULTI-PARAMETER TMDL

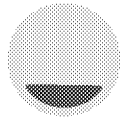
DESCHUTES WATERSHED GROUP MEETING
SEPTEMBER 20, 2018



GOALS OF THIS PRESENTATION

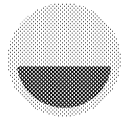
- The State-EPA TMDL process – how we coordinate
- Understanding the reasons EPA disapproved parts of the TMDL
- Lessons learned along the way – how we would like to move forward
- EPA's next steps – replacement TMDLs
- Understand how the public (you) can participate

THE TMDL PROCESS



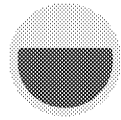
TMDL Draft

- This is where the bulk of the writing happens.
- There is typically one state lead and one EPA lead.
- The State does the technical work while EPA advises as needed.
- EPA also aims to complete the bulk of our review, so that we can work through any major concerns at this stage.



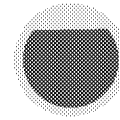
TMDL Public Review

- The State seeks input from the public on the final draft TMDL.



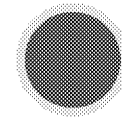
TMDL Revision

- The State will consider comments received from the public, and respond to them.
- If TMDL revisions are needed based on public comments, the state revises the TMDL.



Final TMDL Submittal

- The State submits the final TMDL to EPA.
- EPA has 30 days to make a decision of approval or disapproval.



TMDL Implementation

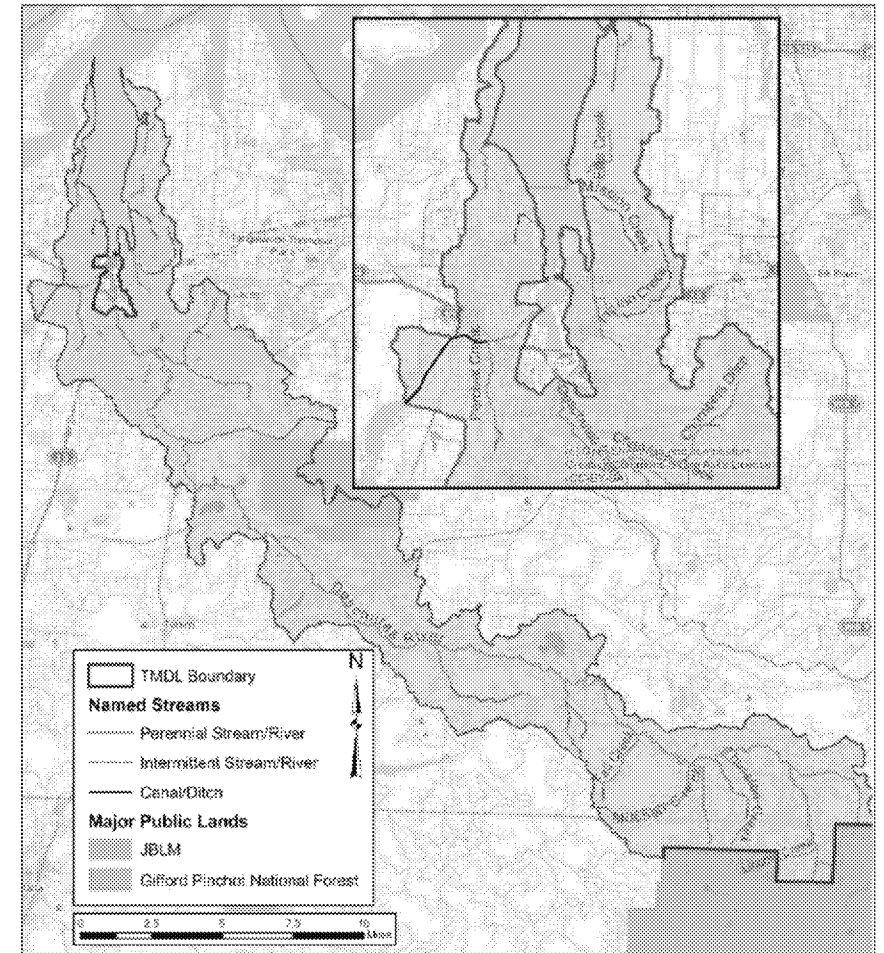
- After approval, the TMDL is in effect.
- Permit limits must comply with the TMDL for point sources.
- Implementation activities can take place to address nonpoint sources of pollution.

WHAT DOES EPA LOOK FOR IN A TMDL?

- Clear identification of sources of impairment
- Water quality target or goal is identified and is protective of water quality standards
- Key assumptions, rationale, and supporting data/documentation for all analyses (i.e. a water quality model)
- Loading capacity (as a daily load) for all waterbodies
- Loading allocations for point and nonpoint sources
- Margin of safety (uncertainty factor)
- Consideration of seasonality and critical conditions
- Reasonable assurances that loadings can be met
- Public participation

EPA'S DECISION ON THE DESCHUTES TMDL

- June 29, 2018
- Partial Approval/Partial Disapproval
- EPA is required to establish replacements for any disapproved portions of the TMDL.



*Taken from TMDL document

EPA'S DECISION ON THE DESCHUTES TMDL

Approval:

- Temperature loads for the mainstem Deschutes R., Black Lake Ditch, and Percival Creek

Disapproval:

- Sediment load for the mainstem Deschutes R.
- Bacteria loads (All)
 - *Took 'no action' for a handful of tributaries which are no longer listed for bacteria
- Temperature loads for remaining tributaries
- DO loads (All)
- pH loads (All)

REASONS FOR DISAPPROVAL

- Incomplete TMDL submittals
- Downstream uses not protected
- Assigned loads do not meet water quality goals
- At EPA's request, Ecology submitted newly calculated bacteria loads – these were not part of original public review

LESSONS LEARNED – EPA PERSPECTIVE

- Continuity
- Communication – clear expectations
- Involving management early and often in complicated cases

LESSONS LEARNED – STATE PERSPECTIVE

- Implementation plans are great – but EPA is focused on allocations
- New issues arise during TMDL development and even post submittal
- Communication with EPA staff is key, especially when there is staff turnover

NEXT STEPS

- EPA will develop replacement TMDLs for the disapproved segments
- EPA has secured assistance from a contractor to do the technical work
- We are currently in the scoping phase - the contractor is reviewing the documents and existing model
 - **Your help: Do you know of any data sources outside of EIM?**
- Our next step will be to put together a technical approach and draft timeline
- We will share regular updates with this group as we pass major milestones
 - **Suggestions for effective ways to share?**

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